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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

JOSEPH FRANK MENDOZA, et. al

Plaintiffs,
v.

LITHIA MOTORS, INC., et. al

Defendants.

CIVIL ACTION NO. 6:16-CV-1264-AA

**JOINT STATUS REPORT ON
DISCOVERY**

Pursuant to § B.3. of the Scheduling Order (Docket #27), the Parties report as follows on the status of discovery:

A. Discovery completed:

Parties have completed their initial disclosures. Plaintiffs have served their first discovery requests (Requests for Production, Requests for Admissions, and Interrogatories) and have received responses to the above requests. Defendants have served their first Requests for Production, which is due June 1, 2017.

B. Discovery not yet completed or scheduled:

It has taken longer than anticipated to coordinate depositions and to complete discovery. Currently, the deposition of Plaintiff Mendoza and only one of Defendants' witnesses (Joshua Hunsaker) have been scheduled. The Parties are working to coordinate the other depositions to take place in July. It is the desire of the Parties to conduct as many depositions in one location as possible to maximize efficiency. To that end the parties are working to establish dates in Mid-July to depose several witnesses in single city locations during multiple days. It is anticipated that all depositions in this matter would be concluded by the first week of August.

The parties respectfully request that the court schedule a status conference to address discovery and to address anticipated and pending motions in this matter and in *Caveye, et al. v. Lithia Motors, Inc., et al.*, Case No. 6:17-CV-0674-TC.

Dated: May 12, 2017

/s/ Bonner Walsh

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